

UNITED STATES BANKRUPTCY COURT
EASTERN DIVISION, DISTRICT OF MASSACHUSETTS

In re:

Andre Bisasor

Debtor

Chapter 13

Case No. 15-13369

MOTION FOR EXTENSION OF TIME TO FILE NOTICE OF APPEAL

NOW COMES Andre Bisasor, debtor, and respectfully moves the court pursuant to FRBP 8002(d) for a 14-day extension of time to file a Notice of Appeal with respect to so much of the court's decision dated October 19 which found that the automatic stay did not apply to the actions of his landlord and/or that sustained the landlord's objection to his certification¹. For reasons, the debtor states that he has been negotiating with the landlord in the hope of obtaining a global resolution of all issues, and it appears some progress has been made, but a final resolution has not yet been reached. Thus the debtor desires to protect his appellate rights in the event that a resolution is not reached.

November 2, 2015

Respectfully submitted,
Andre Bisasor
By debtor's attorney,

/s/ David G. Baker
David G. Baker, Esq.
236 Huntington Avenue, Ste. 302
Boston, MA 02115
617-340-3680
BBO# 634889

Certificate of Service

The undersigned states upon information and belief that the within paper will be served upon the entities named below by the court's CM/ECF system on the date set forth above.

/s/ David G. Baker
David G. Baker

- Donna Ashton on behalf of Creditor Greystar Management Services LP as agent for owner RAR2-Jefferson at Dedham Station MA Inc. - dma@ashton-law.com
- Carolyn Bankowski-13 - 13trustee@ch13boston.com
- John Fitzgerald - USTPRegion01.BO.ECF@USDOJ.GOV

¹ The rule prohibits the court from granting an extension of time to appeal an order granting relief from the automatic stay, but the plain language does not appear to prohibit an extension for the purpose stated herein.